



Control Number: 51415



Item Number: 359

Addendum StartPage: 0

SOAH DOCKET NO. 473-21-0538

PUC DOCKET NO. 51415

APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

**SOUTHWESTERN ELECTRIC POWER COMPANY'S
STATEMENT UNDER SECTION 4 OF PROTECTIVE ORDER**

Certain documents provided in response to Sierra Club's Second Request for Information to Southwestern Electric Power Company (SWEPCO), Question Nos. 2-2, 2-6, 2-10 and 2-16 are exempt from public disclosure pursuant to Section 552.110 of the Public Information Act¹ and are subject to treatment as Confidential or Highly Sensitive materials.

The Confidential materials provided in response to Sierra Club's Question No. 2-10 contain non-public commercially sensitive forecast information including commodity and power market price forecasts that if released, would provide an advantage to a competitor or bidder and could cause substantial competitive harm to SWEPCO.

The Highly Sensitive materials provided in response to Sierra Club's Question Nos. 2-2, 2-6, and 2-16 contain non-public, commercially-sensitive, unit disposition analyses, pricing and forecast data, resource availability information, unit generation data, and modeling analyses under various assumptions, solid fuel unit investment planning and accounting information, and analyses and supporting calculations concerning carbon dioxide emissions regulations compliance, targets and mitigation scenarios that if released, would provide an advantage to a competitor or bidder and could cause substantial competitive harm to SWEPCO.

Counsel for SWEPCO has reviewed the documents sufficiently to state in good faith that the documents are exempt from disclosure under the Public Information Act and merit the Confidential or Highly Sensitive designation given to them.

¹ Tex. Gov. Code Ann. § 552.001-.353.

Respectfully submitted,

Melissa Gage
State Bar No. 24063949
Email: magage@aep.com
aepaustintx@aep.com (Service)

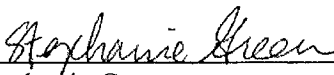
Leila Melhem
State Bar No. 24083492
Email: lmelhem@aep.com
aepaustintx@aep.com (Service)

400 West 15th Street, Suite 1520
Austin, Texas 78701
Telephone: (512) 481-3320
Facsimile: (512) 481-4591
**AMERICAN ELECTRIC POWER SERVICE
CORPORATION**

William Coe
State Bar No. 00790477
Email: wcoe@dwmrlaw.com
Kerry McGrath
State Bar No. 13652200
Email: kmcgrath@dwmrlaw.com

Patrick Pearsall
State Bar No. 24047492
Email: ppearsall@dwmrlaw.com
Stephanie Green
State Bar No. 24089784
Email: sgreen@dwmrlaw.com

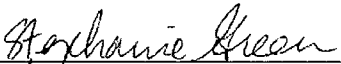
P.O. Box 1149
Austin, Texas 78767
Telephone: (512) 744-9300
Facsimile: (512) 744-9399
DUGGINS WREN MANN & ROMERO, LLP

By: 
Stephanie Green

**ATTORNEYS FOR SOUTHWESTERN
ELECTRIC POWER COMPANY**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on April 9, 2021, in accordance with the Second Order Suspending Rules issued in Project No. 50664 and Order No. 1 in this matter.



Stephanie Green